

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JEFFREY BOGAN,

CASE NO. 2:07-cv-11333

Plaintiff,

HON. AVERN COHN

v.

LIVINGSTON COUNTY DEPUTY JEREMY TRENT,
LIVINGSTON COUNTY DEPUTY KEVIN CRANE,
LIVINGSTON COUNTY DEPUTY RAYMOND JACQUES,

Defendants.

**STIPULATED PROTECTIVE ORDER REGARDING
VIDEOTAPE RECORDING OF THE DEPOSITIONS OF DEFENDANTS**

Plaintiff having served upon Defendants a Third Notice of Taking Video Depositions Duces Tecum of Officers, Jeremy Trent, Kevin Crane and Raymond Jacques, and the Court being otherwise fully advised in the premises;

IT IS HEREBY ORDERED that Plaintiff may conduct depositions of Defendants, including recording their testimony by videotape, subject to the following conditions:

1. The videotapes and images of the Defendants recorded during their depositions shall be for discovery purposes in this litigation only, shall be maintained in confidence by counsel, except as set forth in Paragraph 2, and shall be used only for the purpose of this litigation and no other purpose.

2. The videotapes and images of the Defendants recorded during their depositions may be used as necessary by Plaintiff's Counsel in this case, including at depositions, filings with the court, court proceedings and at trial to the extent admissible. Plaintiff's Counsel may also disclose

such information to his staff, to Plaintiff, and to expert witnesses in this litigation. Plaintiff's Counsel shall advise such individuals of the substance of this Protective Order and that they are bound by its terms.

3. Plaintiff, his attorneys and expert witnesses are bound by these terms through stipulation of Plaintiff's counsel to this Order and each agrees that any and all copies of all videotapes are to be returned to Defendants' counsel by Plaintiff's attorney upon conclusion of this litigation, including all appeals.

Dated: November 06, 2007

s/Avern Cohn

HON. AVERN COHN
U.S. DISTRICT JUDGE

APPROVED AS TO
FORM AND SUBSTANCE:

s/ with consent of DANIEL G. ROMANO (P49117)
Attorney for Plaintiff

s/ ANNE McCLOREY McLAUGHLIN (P40455)
Attorney for Defendants
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